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POLLUTION REPORT

EPA Region 5 Records Ctr.

30005

HEADING

October 9, 1998

Subject:

Date:

Midwest Body Corporation, Paris, Edgar County, Illinois

From:

Kevin Turner, U.S. EPA On-Scene Coordinator, Region 5

To:

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K. Mould, U.S. EPA, OSWER, Washington, DC R. Karl, Chief, Emergency Response Branch

D. Bruce, Chief, Emergency Response Section II

B. Messenger, Chief, Emergency Enforcement Section C. Graszer, Enforcement Specialist

G. Narsete, Office of Public Affairs J. Kujawa, Office of Regional Council

M. Densmore, Illinois EPA

H. Taylor, Chief, Paris Fire Department

POLREP:

1 Initial-Fund Lead Removal

II. BACKGROUND

Site No: B530

Task Order No: 006

CERCLIS No: ILD005157888

Response Authority: CERCLA State Notification: 06/27/97

NPL Status: Non NPL Start Date: 09/29/98

Demobilization Date: N/A

Completion Date: N/A

Status of Action Memorandum: Signed 04/09/98

III. SITE DESCRIPTION

-A. <u>Incident Category</u>:

Inactive Manufacturing Facility

B. Site Location:

2109 South Central Ave

Paris, IL 61944

Site Latitude: 39°35′37.6″ Site Longitude: 87°41′55.2″

1. Site description:

The original 22.3 acre site consists of a 274,000-square-foot abandoned building, two small pump houses, several above ground storage tanks, and a water tower. The site is situated in a

light industrial and residential area. Farmland borders the site to the southwest, Cadillac Products Inc. lies to the southeast; Central Avenue, Bell & Bell Demolition Co., and Moss Grain Co. lie to the east; an alley and residential homes are north of the site; and Foley Lumber borders the site to the west. An active railroad spur enters the property and services two neighboring businesses. There is a fence around the property; however where the railroad spur enters there is unrestricted access. Through a Brownfields renovation agreement with the U.S. EPA, Illinois EPA (IEPA), the City of Paris, and the Robert Morgan Company, the property was divided into two distinct sections. The section west of the Manufacturing building, which is the open field is the area of concern. The other area will be maintained by the Robert Morgan Company.

Midwest Body Corporation began operations in 1908, manufacturing street sweepers and street cars. After World War II, the company produced specialized truck bodies. Production ceased and the plant closed in July 1993. The operations generated the following waste streams; hazardous paint waste (enamel paint residues mixed with xylenes); non-hazardous paint sludges (from water-based paints); used paint booth air filters; water-soluble parts washer rinse waters; welding cooler water; and waste oil (from equipment maintenance). In addition there is one underground storage tank and three aboveground storage tanks.

2. Description of threat:

Hazardous substances found at the site include waste paint containing lead, barium, cadmium, chromium, toluene, ethylbenzene, and xylene. The high concentrations of VOC's are hazardous wastes under 40 CFR 261.33 and are hazardous substances under section 101(14) of CERCLA. Soil samples confirmed that material on site is a hazardous waste under RCRA due to a TCLP lead concentration of 5.7 ppm. IEPA also documented that groundwater contamination has already occurred on site. IEPA has documented at least seven separate locations where buried paint waste or drums and containers were located. U.S. EPA START samples and IEPA samples confirmed that this paint waste contained elevated levels of lead, barium, cadmium, chromium, toluene, ethylbenzene, and xylene. Weather conditions on site (freeze, thaw, rain, and snowmelt) may cause further deterioration of the drums, which could result in additional releases.

C. <u>Preliminary Assessment/Site Inspection Results</u>

An environmental site investigation was conducted by Graef, Anhalt, Schloemer, & Associated (GAS) from July through October 1996. GAS used geophysical electromagnetic surveys to locate possible locations of tanks, drums, and buried utility lines, installed four monitoring wells and three well nests and sampled them to detect groundwater contamination, sampled soil, and excavated 135 test pits to look for drums, paint waste, or other evidence of contamination. Paint waste was found in five discrete areas at depths of up to eight feet. Drum burial and paint container burial pits were found in two locations. Analytical results detected elevated levels of lead, barium, and SVOC's. GAS estimated that 1,000 to 2,000 cubic yards of paint waste were located in test pit areas.

IV. RESPONSE INFORMATION

A. Situation

1. Current situation:

On September 29, 1998 ERRs, START, and OSC Turner mobilized to site. During the week, ERRs crew prepped site by removing weeds and obstacles on site, secured the north gate, and built two earthen berms designed to store and possibly treat contaminated material. A storage trailer and office trailer arrived on site and electricity and telephone lines were connected. A Site Safety plan has been approved by START, ERRs and OSC Turner. OSC Turner coordinated site activities and met with Herman Taylor, Chief of the Paris Fire Department and Tom Boren, Chief of the Paris Police Department to discuss future site activities. OSC Turner also met with Suzanne Averetti with the Beacon News to discuss a newspaper article about the site. START performed air monitoring before, during, and after excavation activities and began photodocumentation. Weather conditions have been mostly cloudy with periods of rain and clear skies, temperature has ranged from 60 to 80° F. Representatives from local utility companies, who were contacted through the Illinois Call Before You Dig Program arrived on site. They confirmed that there are no buried cable, telephone, gas, and water lines running under the property. On October 7, 1998 representatives from seven companies attended a bidders conference for the disposal of material found on site.

2. Removal activities to date:

ERRs has been excavating contamination from two distinct areas. The first excavation pit is located in the center of the property north of the railroad tracks. The pit is oblong shaped and approximately 150 feet long, 35 feet wide (at the widest point), and 15 feet deep (at the deepest point). The second pit is located near the north fence. This pit is approximately 50 feet long, 25 feet wide, and 8 feet deep at the deepest point.

The excavated material was roughly segregated and placed into two categories, contaminated and uncontaminated. The contaminated material was staged in the earthen berm, while uncontaminated material was left in piles near the excavation pit. The pile of contaminated material is approximately 1,200 cubic yards of material as of October 8, 1998. During the excavation waste drums were detected, these drums were staged on a poly liner on the west end of the concrete drive. The drums are severely deteriorated and contained solidified paint material. As of October 8 there are approximately 20 excavated drums.

3. Enforcement:

In April 1995, the City of Paris served a notice of a "complaint of nuisance" against the facility. The City of Paris desires to redevelop the site, but because of allegations of buried waste and

concerns to human health and environment, an investigation was conducted by the IEPA. On June 27, 1997 the IEPA requested assistance from the U.S. EPA Region V. Site activities are coordinated with state and local officials.

Cost recovery actions are pending.

B. Planned Removal Actions

- Excavate buried drums and paint waste
- Stage drums and paint waste
- Off-site disposal of drums and paint waste
- Groundwater monitoring and well sampling
- Confirmation soil sampling of excavated pits

C. Next Steps

Begin soil, groundwater and surface water sampling. Continue to identify and excavate areas of contamination.

D. Key Issues

Determine the method of disposal of contaminated material. Contaminated material was found in the clay layer in the excavation area near the north fence.

V. COSTS

Extramural Costs:

Total Cleanup Contractor (e.g, ERRS) Costs	\$24,933.58
START	\$7,032.95
TOTAL, EXTRAMURAL COSTS	\$31,966.53
Intramural Costs:	
Direct Costs (Region, HQ, ERT)	\$5,000
Intramural Indirect Costs	\$0
TOTAL, INTRAMURAL COSTS	\$5,000
TOTAL SITE COST	\$36,966.53
Project Ceiling	\$1,429,710

Project Funds Remaining (percentage)

97.4%

The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor. Other financial data, which the OSC must rely upon, may not be entirely up to date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

VI. DISPOSITION OF WASTES

Wastestream Medium

Quantity

Containment

Treatment

Disposal